

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES ex rel VALUEOPTIONS
OF NEW MEXICO, INC.,

Relator,

and

VALUEOPTIONS OF NEW MEXICO, INC.
on behalf of the STATE OF NEW MEXICO
and VALUEOPTIONS OF NEW MEXICO, INC.,

Plaintiffs,

v.

Case No. 6:09-cv-00154

PSYCHIATRIC SOLUTIONS, INC.,
BHC MESILLA VALLEY HOSPITAL
d/b/a MESILLA VALLEY HOSPITAL
and PEAK BEHAVIORAL HEALTH
SERVICES, INC.

Defendants.

JOINT MOTION TO STAY DISCOVERY

The parties to this matter, by their undersigned counsel, hereby jointly move this Court for an Order setting a briefing schedule for Motions to Dismiss (the “Motions”) and staying discovery while such Motions are pending, and in support thereof, state as follows:

1. Pursuant to Notice from the Department of Justice declining to intervene in this matter, this Court unsealed the Amended Complaint and directed that it be served on defendants.

2. During a January 18, 2011 status conference with the Court, defendants requested that they have until March 7, 2011 to file the Motions. Plaintiff concurs in this request and proposes that it be given until April 4, 2011 to file its response to any such motion. The parties propose defendants’ Replies in further support of the Motions be filed no later than April 19, 2011.

3. In addition, the parties jointly request that the Court stay discovery in this matter pending disposition of the Motions.

4. It is the parties' belief that these proposed scheduling changes will allow the parties appropriate time to brief the complex issues in this case in a manner most useful to this Court.

5. Finally, the parties request that the Court set, by separate order, a settlement conference in late April 2011.

6. A proposed Order is being e-mailed to chambers for the convenience of the Court.

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Approved via Email 2/2/2011

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